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Comments on CALFED document : Water Quality Program

Page	description	comment
8	Table 1	I think lead and arsenic should be included here. Small doses of lead have been found to be very important for pregnant women and unborn children. Arsenic has the same potential.
	Table 3	Missing checks? 1) Bay - U and I runoff, Water treatment, Management, Human health 2) Sacramento and San Joaquin Rivers - Water treatment, Management, Human health
12		Targets are misleading and unnecessary for most of these. EPA already has guidelines - why aren't these being used?
13		Justification for the choice of these substances is needed. Why were others not chosen?
15		Wrong assumption. High nutrient concentrations in the San Joaquin River are not the problem. They are consistently high, but do not consistently produce dissolved oxygen problems. The real problem is in the Turning Basin, where petroleum discharge increases the organic load and causes a subsurface bloom of organic-loving phytoplankton. This condition is probably the primary cause of low dissolved oxygen in the channel.
15.		Wrong assumption. Turbidity has decreased by a factor of 2 in the Delta already. Decreasing it further is not beneficial.
16.		Inconsistency: reduction of TOC is inconsistent with CALFED goal to increase TOC load to estuary with shallow water habitat. Also THM precursors were not mentioned.
17		A1 does not mention petroleum products. A2 There is no proof that high nutrients are a problem. If they were a problem, we would have extremely high chlorophyll concentrations throughout the river - we don't.
19-20		First demonstrate these are a problem. High nutrients and high sediment are probably natural. TOC is unknown.

- 24-25 Why not include assays for other substances such as pharmaceuticals that in low concentrations threaten children and pregnant women
- 27 Include drinking water quality variables in here e.g. lead
- 29 Table 2
- 1) Include pesticides for urban runoff; storm drains are an important source.
 - 2) Delta water ways should list copper, turbidity, selenium, zinc, cadmium, lead, PCB, temperature
 - 3) SB wetland should include pesticides.
 - 4) Sacramento River should have full suite of metals, temperature, PBC, turbidity, nutrients
 - 5) San Joaquin R should have temperature, PCB, turbidity, nutrients, BOD
- 35 Table 4 include selenium, temperature, lead, mercury
- 38- Table 4 Target concentrations too high Sacramento R., San Joaquin R. and Delta, based on EPA guidelines for marine and freshwater organisms
- 1) Cd for freshwater chronic
 - 2) Cu for marine acute and chronic
 - 3) Zn marine acute and chronic; freshwater chronic
 - 4) DDT for marine acute
 - 5) Toxaphene marine acute
 - 6) temperature targets need to address seasonal variation
- 52 Nutrient concentrations do not lead to oxygen depletion in Delta or we would be swimming in phytoplankton. Nitrate, phosphate and silica and chlorophyll concentrations are not positively correlated
- 52-53 Secchi disk depth has increased by a factor of 2 - less sediments are going the wrong way
- 52-53 Inconsistency. Reducing TOC is inconsistent with CALFED goal of increasing TOC for food web by increasing shallow water habitat.
- 53 THM and source material need to be included here